

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: LIQUID ALUMINUM SULFATE
ANTITRUST LITIGATION**

*This Document Relates to: Putative Class of
Direct Purchaser Plaintiffs*

Civil Action No. 16-md-2687 (JLL)(JAD)
(MDL No. 2687)

Return Date: December 19, 2016

Oral Argument Requested

NOTICE OF DEFENDANT GEO'S MOTION TO DISMISS UNDER RULE 12(b)(6)

James H. Mutchnik
Sydney L. Schneider
KIRKLAND & ELLIS LLP
300 N. LaSalle Street
Chicago, IL 60654
Phone: (312) 862-2000
Fax: (312) 862-2200
james.mutchnik@kirkland.com
sydney.schneider@kirkland.com

Cormac T. Connor
KIRKLAND & ELLIS LLP
655 15th Street, N.W., Ste 1200
Washington, DC 20005
Phone: (202) 879-5000
Fax: (202) 879-5200
cormac.connor@kirkland.com

Robert F. Ware
Mark R. Butscha, Jr.
THOMPSON HINE LLP
3900 Key Center
127 Public Square
Cleveland, OH 44114
Phone: (216) 566-5500
Fax: (216) 566-5800
rob.ware@thompsonhine.com
mark.butscha@thompsonhine.com

Attorneys for Defendant GEO Specialty Chemicals, Inc.

PLEASE TAKE NOTICE that on December 19, 2016, at 9:30 a.m., or at such other date and time as may be set by the Court, Defendant GEO Specialty Chemicals, Inc. (“GEO”), by and through its counsel, Kirkland & Ellis LLP and Thompson Hine LLP, will move before the Honorable Jose L. Linares, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 5D, Newark, New Jersey 07101, for an Order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing the Direct Purchaser Plaintiffs’ Consolidated Amended Complaint (Dkt. 220) with prejudice as to claims related to any conduct prior to December 31, 2004.

PLEASE TAKE FURTHER NOTICE that in support of this Motion GEO will rely on the accompanying Memorandum of Law, Declaration of James Mutchnik and exhibits thereto, and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a Proposed form of Order granting this Motion is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that GEO hereby requests oral argument.

Dated: October 21, 2016

By: /s/ James H. Mutchnik
James H. Mutchnik
Sydney L. Schneider
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Fax: (312) 862-2200
james.mutchnik@kirkland.com
sydney.schneider@kirkland.com

Cormac T. Connor
KIRKLAND & ELLIS LLP
655 Fifteenth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 879-5000
Fax: (202) 879-5200
cormac.connor@kirkland.com

Robert F. Ware
Mark R. Butscha, Jr.
THOMPSON HINE LLP
3900 Key Center
127 Public Square
Cleveland, OH 44114
Phone: (216) 566-5500
Fax: (216) 566-5800
rob.ware@thompsonhine.com
mark.butscha@thompsonhine.com

*Counsel for Defendant GEO Specialty
Chemicals, Inc.*